

From: rjmorat@gmail.com on behalf of [Richard Morat](#)
To: Delta.Plan.Comments@Deltacouncil
Subject: comments on First Staff Draft of Delta Plan
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Comments on First Staff Draft Delta Plan dated 2-14-2011

Chapter 1 – your writers need to get consistent on the co-equal goals claims. They use words like “achieve”, “success will be if it allows CA to move forward”, and in Chapter Two, page one, line 4 “further co-equal goals”. What is it?

Chapter 2 – Geographic Scope, Secondary Planning Area: Comment was made at a public workshop that the Secondary Planning Area needs to include the bays downstream of Suisun (San Pablo, Central and South) but this is not yet reflected. The Bays are users of water but not by diversion, rather instream use. Stop splitting the estuary for no good reason. The Commerce/NEPA hurdle is as high as the State’s.

Chapter 6 – The council needs to hire an editor with a “junkyard dog’s” persistence at finding bias.

Examples:

Page 6-3, lines 37-40, you should delete the last two sentences of this finding, to be fair.

Page 6-4, second bullet finding: Delete this bullet, you are whining. The next bullet adequately explains that the scientific infrastructure and expertise are lacking; it is not the permitting that is at fault, it is the fault of the project sponsors to present a sound and complete project description.

Page 6-4, line 27-29: Delete this sentence; the point has already been made, twice, in succession.

Page 6-4, Improve Water Quality: These two code references appear to be in the wrong chapter of the draft plan. I go back to my experience once with engineers proposing we reduce organic carbon in the estuary to protect drinking water from

THMs. We need to manage estuarine water quality for estuarine purposes and treat drinking water; this is real ecosystem management.

Page 6-5, line 23: Most flood plains and almost all of the interior valley wetlands (National Wildlife Refuges and State Waterfowl Areas) are, regrettably, managed with offstream water supplies.

In spite of these comments, I appreciate the transparency, adherence to schedule, diligence, and opportunity to participate.